

UNITED STATES DISTRICT COURT

Northern District of Indiana
South Bend Division

UNITED STATES OF AMERICA,
Plaintiff

CASE NUMBER: 3:19-CR- 105

vs.

JESSIE WADE RICHARDSON,
Defendant

DEFENDANT'S SENTENCING MEMORANDUM

The Defendant, Jessie Wade Richardson, by CJA counsel, David P. Jones, for his Sentencing Memorandum, states:

On January 24, 2020, Mr. Richardson pled guilty to Count 1, charging the Defendant with making a bomb threat by a telephone call to a FedEx facility in South, Bend, Indiana.

Mr. Richardson's total offense level is only 13 but because of his criminal history category, his guideline range of imprisonment is 33-41 months.

Fueled by the rage of jealousy, the defendant called his girlfriend's place of employment and made a bomb threat.

Almost immediately Mr. Richardson admitted his criminal conduct. In fact, he plead guilty less than thirty days after his arrest. He has been incarcerated ever since.

Mr. Richardson has clearly seen the error of his ways and the impact incarceration has had on his girlfriend and his family of four children.

The defendant has been in a long-term relationship with his girlfriend since the age of 16. Together, they have two young children under the age of 3. Mr. Richardson also has two “step-children” under the age of 12. There has been no abuse in the relationship and their children are healthy with no involvement from Department of Child Services. As evidenced by the attached letters, Mr. Richardson has a support system and people who care about him and his future.

It appears drugs and alcohol have played a role in the defendant’s criminal conduct and prior criminal history. Therefore, the defendant requests, that the Court make a judicial recommendation for the Residential Drug Abuse Program if the defendant is qualified and has sufficient time to complete the program. The Defendant has never attended inpatient or outpatient treatment but has had a few drug classes. If the defendant can get his substance abuse under control, his criminality should subside.

Given the facts and circumstances of this case, the low end of the Guideline Range, or 33 months, would be a sentence that is sufficient but not greater than necessary, to accomplish the objective set forth by Congress.

Date: August 27, 2020

s/David P. Jones
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/CM/ECF system which sent notification of such filing to the following: molly.donnelly@usdoj.gov

NEWBY, LEWIS, KAMINSKI & JONES, LLP

/s/David P. Jones

David P. Jones, #17393-64